

**REMARKS**

In the Office Action, the Examiner indicated that claims 1 through 22 are pending in the application and the Examiner rejected all claims.

**Objections to the Specification**

On page 2 of the Office Action, the Examiner objected to the disclosure as lacking a complete priority reference in paragraph [0001]. In response, applicants have included herein a replacement paragraph including a complete priority reference with corresponding application numbers. The Examiner is respectfully requested to reconsider and withdraw the objection to the specification in light of this replacement paragraph.

**Claim Rejections, 35 U.S.C. § 102**

On page 2 of the Office Action, the Examiner rejected claims 1-22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0168169 to Ebro et al. (“Ebro”).

**The Present Invention**

The present invention teaches a method, system, and computer program product enabling multiple versions/releases of a J2EE application to be served to clients from a single application server. One or more JNDI proxies are situated between each client and the application server. Specifically, claim 1 recites “interposing a Java Naming and Directory Interface (JNDI) proxy

between each client and the application server” (line 4). The JNDI proxies allow a same public "service name" to be utilized by different clients to access different versions of programs/services on the application server. Claim 1 further recites “associating each client with one of said versions; and using said JNDI proxy, directing the version associated with a particular client to said particular client upon a request by said particular client for said J2EE program” (lines 5-7). The JNDI proxies perform this association by translating the service name into a non-public "alias name" on behalf of the client. The alias name is a private name that the service provider who administers the application server understands and uses to locate the specific version of programs/services that the clients need.

**U.S. Patent Application Publication No. 2004/0168169 to Ebro et al.**

U.S. Patent Application Publication No. 2004/0168169 to Ebro et al. (“Ebro”) teaches a method of aiding deployment in a distributed computer system, using application software components, including providing a tree representation of objects existing in at least some of the application software components, the tree representation including an object as a leaf node, with the attributes of the object being in nexus between the root and the leaf node. Ebro also provides an accessor object predefined names and functions used to access the individual leaf nodes, thereby facilitating remote application access.

**The Cited Prior Art Does Not Anticipate the Claimed Invention**

The MPEP and case law provide the following definition of anticipation for the purposes of 35 U.S.C. §102:

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” MPEP §2131 citing *Verdegaal Bros. v. Union Oil Company of California*, 814 F.2d 628, 631, 2 U.S.P.Q. 2d 1051, 1053 (Fed. Cir. 1987)

**The Examiner Has Not Established a *prima facie* Case of Anticipation**

As noted above, the present claimed invention includes associating each client with one of multiple versions of a J2EE program stored on a single application server based upon a request by the particular client. A typical prior art J2EE program has multiple levels, some of which are run on a client side, and some of which are run on the server side. In such prior art systems, in order to avoid incompatibility issues, both the server side and the client side must be running the same version of the J2EE program. In the present invention, multiple versions of J2EE programs are maintained in a single server for assuring compatibility with all users, even those who may be running outdated versions. This is advantageous over the prior art which either forced a client to upgrade its program to the current version, or redirected a client to another server which had the outdated version. Forcing a client to upgrade has inherent risks, e.g., the client's computer may not have the hardware resources to handle the upgraded version. The other alternative, redirecting clients to a second server with a matching software version incurs additional hardware costs and requires additional programming effort to configure multiple application servers. For these reasons, prior art application providers do not attempt to provide multiple

versions or releases of the same application. The present invention, however, patentably defines as novel over the prior art, including Ebro, by teaching associating each client with one of multiple versions of a J2EE program stored on a single application server.

Ebro teaches a distributed application system which uses a series of “deployers” for organizing and managing software applications. Each deployer (as illustrated in Figures 9 and 10 of Ebro and the accompanying text descriptions) manages access by a series of clients to the resources available at one or more servers. However, in contrast to the present invention, Ebro fails to disclose associating each client with one of multiple versions of a J2EE program stored on a single application server.

The Examiner points to paragraph [0121] as teaching this limitation. Paragraph [0121] recites: “the TTSystemHome object has been bound with a Name composed of atomic names, with values of the following attributes: ‘root’, ‘apiType’, ‘vendor’, ‘product’, ‘version’, ‘name’”. Here, Ebro is merely stating that in each attribute listing for each application, a version field is maintained. However, nowhere does Ebro expand upon this version field other than introducing it as an attribute. No examination is made of the version a client has, no comparison is made, and no “associating each client with one of said version” stored on a single application server is disclosed by Ebro. Rather, Ebro is silent on associating clients with one of the available versions of a J2EE program based upon a particular client request as is specifically claimed by the present invention.

Without a teaching of associating each client with one of multiple versions of a J2EE program stored on a single application server based upon a request by a particular client, Ebro

cannot be said to anticipate the present invention. Accordingly, each of the independent claims, and all claims depending therefrom, patentably define over Ebro and are in condition for allowance.

**Conclusion**

The present invention is not taught or suggested by the prior art. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims. An early Notice of Allowance is earnestly solicited.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment associated with this communication to Deposit Account No. 09-0457.

Respectfully submitted,

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